

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA

ABIGAIL JORDAN and BERTA  
JORDAN, individually,

*Plaintiffs,*  
v.

CHATHAM COUNTY BOARD OF  
EDUCATION, et. al.,

*Defendants.*

---

CASE NO. 1:22-cv-12

**PLAINTIFFS' UNOPPOSED  
MOTION FOR EXTENSION OF  
TIME TO RESPOND TO  
DEFENDANTS' MOTION TO  
DISMISS**

**NOW COME** Plaintiffs, Abigail Jordan and Berta Jordan, by and through their counsel, Keith Altman, with this Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Dismiss and hereby state the following:

1. Defendants filed their Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(2), and 12(b)(6) on December 19, 2022 (ECFs 21, 22).
2. Plaintiff's Response to Defendant's Motion to Dismiss is due on January 9, 2023.
3. During the last month, Plaintiffs' attorney's firm has undergone significant staffing changes. Additionally, Plaintiffs' attorney is concurrently preparing for oral argument before the Supreme Court in February.

4. Plaintiffs respectfully request a 30-day extension of time to file their Response to Defendants' Motion to Dismiss, making the Response due on or before February 8, 2022.

5. Plaintiffs have conferred with the Defendants on the details of the present Motion and Defendants have advised that they will not oppose the Motion.

6. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

**WHEREFORE** the Plaintiffs request that the Court approve the foregoing Motion.

Dated: December 20, 2022

Respectfully Submitted,

/s/ Keith Altman  
Keith Altman, Esq. (*pro hac vice*)  
LAW OFFICE OF KEITH ALTMAN  
33228 West 12 Mile Road, Suite 375  
Farmington Hills, Michigan 48334  
Telephone: (248) 987-8929  
[keithaltman@kaltmanlaw.com](mailto:keithaltman@kaltmanlaw.com)  
*Attorney for Plaintiffs*

**WORD COUNT CERTIFICATION**

Pursuant to Local Rule 7.3(d), I hereby certify that the foregoing Motion is less than 6,250 words (excluding caption, signature line, and certificates of counsel) as reported by the word-processing software.

This 20<sup>th</sup> day of December 2022.

*/s/Keith Altman*  
Keith Altman, Esq.

**CERTIFICATE OF SERVICE**

The undersigned hereby states that on December 20, 2022, he caused the foregoing document to be filed electronically with the Clerk of the Court using CM/ECF which will send notification of such to all counsel of record.

This 20<sup>th</sup> day of December 2022.

*/s/Keith Altman*  
Keith Altman, Esq.